**STATE BOARD OF ANIMAL HEALTH**
Department of Agriculture
600 E. Boulevard Ave. Dept. 602
Bismarck, ND 58505-0020
(701) 328-2654
FAX (701) 328-4567





April 21, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

To Whom It May Concern:

I recently read in *Food Safety Digest* that Lyle Vogel of the American Veterinary Medical Association agreed that the consumer should have the right to know that a product was irradiated, but the statement needs to be worded in such a way as to convey assurance to the consumer that the product is safe so that the statement is in **no** way misconstrued as a warning label.

For example, if the statement started off with something to the effect … "In order to assure food safety, this product has been irradiated."

I would concur that **how** that statement is worded and how it **looks** is critical to how the public will receive it. If it is to be on the product label, I would suggest it not appear to be hidden, but should be easily read and presented as an 'added value' to the product, not something to be concerned about.

As a veterinarian, a cattle producer and most importantly a consumer of beef, I have scientific, financial, and health interests in how irradiation will affect the demand for beef. If you have further questions, I can be contacted at 701-328-2657.

Sincerely,

Susan J. Keller

Susan J. Keller, DVM
Deputy State Veterinarian

SJK:tlc

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98N-1038

Covering Animal Production Food Safety Initiatives, Issues and Ideas

# Food Safety Digest

An LCI Publication

March/April 1999

# USDA releases guidelines for irradiation


Providing industry with another tool to improve food safety, Agriculture Secretary Dan Glickman recently announced guidelines allowing irradiation of raw meat and raw meat products. This announcement comes more than a year since the Food and Drug Administration (FDA) approved irradiation.

"When it comes to food safety, there is no silver bullet," Glickman says. "But, used in conjunction with other science-based prevention efforts, irradiation can provide consumers with an added measure of protection."

Food irradiation uses radiant energy to reduce or eliminate potentially dangerous microorganisms on meat and poultry. FDA determined in December 1997 that use of irradiation technology on raw meat is safe.

"The Secretary's announcement that USDA's Food Safety and Inspection Service (FSIS) is releasing guidelines for irradiation on ground beef is welcomed news for the beef industry," says Charles Schroeder, CEO, National Cattlemen's Beef Association. "It is not often that industry eagerly awaits new government regulations and guidelines, but the use of this technology in the beef industry will benefit both beef producers and consumers."

"This action is a victory for consumers and the red meat industry," says J. Patrick Boyle, American Meat Institute's president and CEO. "Irradiation is the only technology other than thorough cooking

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## Irradiation labeling petition by Food and Drug Administration

The U.S. Food and Drug Administration (FDA) has begun soliciting public comments about whether changes are needed for federal regulations requiring irradiated food to be labeled as such.

Currently, FDA requires that retail packages or displays of irradiated food include both the logo for irradiation and a statement like "treated by irradiation," and that such notices be prominently displayed. FDA is asking whether irradiation labeling should be less conspicuously displayed, such as being included as part of a list of ingredients.

"I'm not sure that the labeling is scientifically justified," says Lyle Vogel,of the American Veterinary Medical Association. "However, the consumer should have the ability to determine if a product has been irradiated." He adds that unless an incentive statement is added, the current labeling requirements will probably be viewed by consumers as a warning.

FDA is accepting comments on the issue until May 18. Submit written comments and supporting material to the Dockets Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852.

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# USDA releases guidelines for irradiation

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that can destroy all harmful bacteria on raw foods."

Irradiation is currently the only known method to eliminate completely the potentially deadly *E. coli* O157:H7 bacteria in raw meat. The technology can also significantly reduce levels or eliminate listeria, salmonella and campylobacter on raw product.

"We applaud FSIS's efforts in proposing adjustments to the meat inspection regulations to allow the use of ionizing radiation in reducing the risk of foodborne pathogens in meats," says Fred Troutt, chairman of the Livestock Conservation Institute's Food Safety Assurance Committee. "We certainly feel that this is a another positive step in FSIS's efforts to further enhance the safety of our meat supply. It's a plus for producers and consumer alike."

Troutt continues by saying, "For optimum benefits it is likely all 'links' in the meat food chain will have to increase public information efforts about meat irradiation."

Food irradiation is a safe, simple and inexpensive process used since the 1950s to kill harmful pathogens in many foods and to enhance their shelf life. Food is exposed to a carefully measured amount of intense radiant energy, called ionizing radiation. This radiant energy kills parasites and microorganisms such as *E. coli* O157:H7 and salmonella. Irradiation can be compared to pasteurization; as with the heat pasteurization of milk, the irradiation process kills harmful bacteria.

The safety and effectiveness of food irradiation has been extensively researched around the world, according to Dane Bernard, National Food Processors Association vice president of food safety programs. "Authoritative scientific bodies ranging from the World Health Organization (WHO) to the American Medical Association, all agree with FDA that food irradiation presents no health risk," he says. "More than 35 countries have approved irradiation as a safe food treatment technology."

"The predominant conclusions of health organizations such as WHO is that the process is safe," says Lyle Vogel of the American Veterinary Medical Association (AVMA). "Of course, adequate safeguards must be used to protect the workers that process the products and for transportation of radioactive materials if electronic beam irradiation is not used. But many companies are experienced in occupational protection and transportation safeguards because they have been irradiating other items such as medical supplies for many years."

A recent survey by the Grocery Manufacturer's of America (GMA) and the Food Marketing Institute shows 80% of consumers say they would be likely to purchase a food product for themselves or their children if it was labeled, "irradiated to kill harmful bacteria." Approximately 60% of consumers say irradiation's effect on both harmful bacteria and nutrition is "very important."

"We have to lay the proper groundwork so that consumer doubts are addressed and their fears are answered by facts," says Gene Grabowski, GMA vice president of communications. "The next important effort for all of us is consumer education."

Vogel agrees that education is needed and that a combined education and awareness effort by the government and industry would be very helpful. He explains that if approved, the meat and poultry companies may use incentive labeling to explain the food safety advantages of irradiation.

Two Florida companies recently announced that they expect to be the first firms in the U.S. to market irradiated meat products for consumers. This agreement is between Food Technology Service Inc. (FTSI) and Colorado Boxed Beef, Auburndale, Fla., a $600 million sales company, specializing in manufacturing, processing and distributing beef products in the southeast.

Along with proposing to allow ionizing radiation on red meat, FSIS is proposing to revise the regulations governing the irradiation of poultry so that they will be as consistent as possible with the proposed regulations for irradiation of meat food products.

Also, the proposed rule requires labeling of irradiated meat and meat products sold for retail. FSIS is proposing that package labels contain the radura symbol and a statement indicating that the product was treated by irradiation.

The U.S. Department of Agriculture's Food Safety and Inspection Service published the proposal to allow irradiation of raw meat and meat products in the Federal Register on February 24. The proposed regulation can be viewed on FSIS's web site at: http://www.fsis.usda.gov.

Written comments can be submitted until April 26 to:

FSIS Docket Clerk, Docket #97-076P
Room 101 Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

**DEPARTMENT OF AGRICULTURE**
Roger Johnson
Commissioner
600 E Boulevard Ave Dept 602
Bismarck ND 58505-0020

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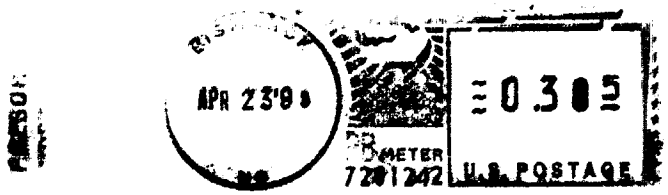


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FOOD & DRUG ADMINISTRATION
5630 FISHERS LANE, ROOM 1061
ROCKVILLE MD 20852

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